

UNITED STATES DISTRICT COURT

for the  
Eastern District of Virginia



United States of America

v.

**SIERRA DANYELLE HALSEY**

*Defendant*

**UNDER SEAL**

Case No. 2:14mj 82

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Between on or about the dates of April 11 through on or about April 21, 2013 in the city of Suffolk in the Eastern District of Virginia, the defendant violated:

*Code Section(s)*

18 U.S.C. § 2251(a)

*Offense Description(s)*

To employ, use, persuade, induce, entice, or coerce any minor to engage in, or who has a minor assist any other person to engage in, or who transports any minor in interstate or foreign commerce, or in any Territory or Possession of the United States, with the intent that such minor engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, if such person knows or has reason to know that such visual depiction will be transported in interstate or foreign commerce or mailed, if that visual depiction was produced using materials that have been mailed, shipped, or transported in interstate or foreign commerce by any means, including by computer, or if such visual depiction has actually been transported in interstate or foreign commerce or mailed.

This criminal complaint is based on these facts: **Please see attached Affidavit.**

READ AND REVIEWED:

Elizabeth M. Yusi  
Assistant United States Attorney

☒ Continued on the attached sheet.

*Complainant's signature*

Paul G. Wolpert, Special Agent, DHS/HSI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 2/27/2014

*Judge's signature*

City and state: Norfolk, VA

Douglas E. Miller  
United States Magistrate Judge

*Printed name and title*